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COLE SCHOTZ P.C.

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Attorneys for Defendants Garth Andre Naar and Avatar Management LLC

EHP60N WAKEMAN LLC, EHP248O CENTER LLC, EHP120N IVY LLC, EHP242EO BURNETT LLC, ERIC HANTMAN, derivatively on behalf of EHP76B HECKEL LLC, EHP224N PARKER LLC, HHP256 NEPTUNE LLC, UHP461-HHP6600NB SMITH LLC, and PRIME NY INC., derivatively on behalf of EHP105N SCHOFIELD LLC, 475E CATHERINE LLC, EHP28-30 GREYLOCK LLC, and EPH312N SUMMER LLC,

Plaintiffs,

v.

GARTH ANDRE NAAR, AVATAR MANAGEMENT LLC, and SILVAN REAL ESTATE INCOME FUND, LP,

Defendants,

and

EHP76B HECKEL LLC, EHP224N PARKER LLC, HHP256 NEPTUNE LLC, UHP461-HHP6600NB SMITH LLC, 475E CATHERINE LLC, EHP28-30 GREYLOCK LLC, and EPH312N SUMMER LLC.

Nominal Defendants.

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
CIVIL ACTION NO. 2:18-cv-11047-KM-JBC

Civil Action

**[PROPOSED] ORDER GRANTING
COLE SCHOTZ P.C.'S MOTION FOR
LEAVE TO WITHDRAW AS
COUNSEL FOR DEFENDANTS
GARTH ANDRE NAAR AND
AVATAR MANAGEMENT LLC**

THIS MATTER, having been brought before the Court by way of Cole Schotz P.C.'s motion seeking leave to withdraw as counsel for defendants Garth Andre Naar and Avatar Management LLC (collectively, the "Avatar Parties"); and the Court having considered the papers filed in support of the motion and in opposition thereto, if any; and for good cause shown;

IT IS on this _____ day of December, 2018,

ORDERED that Cole Schotz P.C.'s motion for leave to withdraw as counsel is granted;
and it is further

ORDERED that Cole Schotz P.C. is hereby relieved as counsel for the Avatar Parties;
and it is further

ORDERED that within three (3) days of receipt of this Order, Cole Schotz P.C. shall
serve a copy of this Order on the Avatar Parties by electronic and overnight mail; and it is further

ORDERED, that Avatar Management LLC shall obtain substitute counsel within _____
days of receipt of this Order.

Hon. Kevin McNulty U.S.D.J.